

WHEREFORE, Defendants respectfully request that this Court allow its Motion to Amend Its Answer.

CERTIFICATION OF CONFERENCE

The undersigned represents that on August 20, 2004, the undersigned conferred with Plaintiffs' counsel, Paul J. Klehm regarding the above Motion.

Dated: September 2, 2004

Defendants,

ASSUMPTION COLLEGE,
DR. THOMAS R. PLOUGH,
DR. JOSEPH F. GOWER, and
DR. JOHN F. MCCLYMER,

By their attorneys,

_____/s/ Douglas F. Seaver
Douglas F. Seaver (BBO# 450140)
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CERTIFICATE OF SERVICE

I, Douglas F. Seaver, hereby certify that I have this 2d day of September 2004 forwarded a copy of Defendants' Motion To Amend Answer To Include Additional Affirmative Defense via e-mail and first class mail, postage pre-paid to Plaintiffs' counsel of record: James B. Krasnoo, Esq. & Paul J. Klehm, 23 Main Street, Terrace Level, Andover, MA 01810.

_____/s/ Douglas F. Seaver
Douglas F. Seaver